Multi-Media Inspection
TSCA/PCB & RCRA

Arsenal Business Center
5301 Tacony St.
Philadelphia, Pa. 19137

Date of Inspection: October 22 & 23, 1997

EPA Representatives:

Gerard Crutchley
Environmental Protection Specialist
Region III, Annapolis

Jose Jimenez
Chemical Engineer
Region III, Philadelphia

Facility Representatives:

Mark Hankin
President

Jay Comly
New Huntingdon Development Corp.

Michael Markovitz
Vice President

Background

The Environmental Protection Agency (EPA), Region III's Facility Inspection Program received a request from EPA Region III's Waste and Chemical Management Division to conduct a multi-media inspection at the Arsenal Business Center (former Frankford Arsenal) located in Philadelphia, Pennsylvania. Representatives from the Facility Inspection Program had inspected the facility on two previous occasions, December 6, 7, & 8, 1995 and April 2 & 3, 1996. During

the two previous visits at the facility, the EPA inspectors documented numerous problems with the TSCA/PCB regulations. This inspection was requested as a follow up to the previous inspections to determine if the facility has taken the appropriate actions to comply with the PCB regulations at 40 CFR, Part 761.

In addition, the inspector was asked to review the facility's compliance with hazardous waste regulations (RCRA). During the April, 1996 inspection, EPA personnel observed a number of drums and several gas cylinders stored in an old bunker building. It was not determined at that time what might be contained in the drums and it appeared that material from some of the drums had leaked onto the floor in the bunker building.

The facility was informed of the subject inspection approximately one week prior to the inspection in a letter that was sent from EPA Region III to the facility's legal representative, Fellheimer, Braverman & Kaskey, Attorneys at Law.

Inspection Activities

Opening Conference

On October 22, 1997, Gerard Crutchley and Jose Jimenez arrived at the Arsenal Business Center at 1000 and met with Mr. Mark Hankin. The inspectors presented their credentials to Mr. Hankin identifying them as authorized representatives for the EPA Regional Administrator. The inspectors also presented to Mr. Hankin a TSCA Notice of Inspection and a TSCA Inspection Confidentiality Notice. Mr. Hankin read and signed the TSCA Notice of Inspection. Mr. Hankin also read the TSCA Inspection Confidentiality Notice and said that he would return it after reviewing it more thoroughly.

The EPA inspectors told Mr. Hankin what they expected to accomplish during the inspection including, but not limited to, a tour of all locations presently containing PCBs and all locations where PCBs were previously located and a review of all facility records related to the use, storage and disposal of PCBs and PCB Items. Mr. Hankin said that most of the records were presently in Mr. Alan Fellheimer's office and that he would have to have them brought to the facility. For purposes of the facility tour, Mr. Hankin said that the EPA inspectors would be accompanied by Mr. Jay Comly, an employee for the New Huntingdon Development Corporation.

Mr Hankin did discuss some of the actions which the facility has taken to comply with the PCB regulations including the removal of some transformers and capacitors. He said that all transformers and enclosures have been cleaned to remove PCB contamination, the transformers have been painted and the floors in the enclosures have been sealed. He also said that secondary containment has been provided at all PCB Transformer locations and all of the transformers and enclosures have been marked with PCB M_L labels.

10/22/97

Facility Tour

Building 202, Substation 20

An electrical room located inside of building 202 contains three PCB Transformers. The door to the electrical room was locked and it was marked with a PCB M_L label. One Transformer was marked with the PCB M_L label, but transformer nos. 15173 & 15174 were not marked with the PCB M_L label. These two transformers had a label of the same dimensions as the PCB M_L label; however, they were covered with paint (See Photo No. 1). Mr. Hankin immediately told Jay Comly to obtain new labels and place them on the two transformers where the labels had been covered by paint. Mr. Comly left and returned a short time later with new labels which he then placed on the two transformers. There were no leaks or stains observed on or around any of the three transformers. A concrete block containment area had been constructed around the three transformers. The contained area measured approximately 248" by 72" by 8".

The electrical room also contained a metal capacitor cabinet. There were twelve capacitors in the cabinet and each was marked with a PCB M_L label. The nameplate on the cabinet indicated the capacitors were manufactured by Aerovox, serial no. 4381318 and were rated at 460 volts. A concrete block containment area had been constructed around the capacitor cabinet. There were no leaks or stains observed on or around the capacitors.

This building is used by the Philadelphia District Attorney's office for storage of confiscated items.

Building 210, Substation 22

A fenced enclosure located adjacent to building 210 contains six transformers. The entry gate to the enclosure was marked with a PCB M_L label. Each of the transformers had been freshly painted. Three of the transformers were marked with PCB M_L labels and the other three were marked with PCB Contaminated labels. A concrete block containment area had been constructed around the six transformers. The containment area measured approximately 352" by 80" by 8". The three transformers marked as PCB Contaminated were not in service at the time of the inspection. There were no leaks or stains observed on or around any of the six transformers.

It was noted that the nameplates on all six transformers had been covered by paint. The EPA inspectors recommended to facility personnel that they have the paint removed from the nameplates.

This building is a multi tenant building.

Building 215, Substation 23

This area consists of an outdoor fenced enclosure which contains three PCB Transformers. The entry gate was locked and the enclosure was marked with a PCB M_L label. During the 1995 EPA inspection, this substation contained five PCB Transformers. Two of the transformers have been removed from this substation since the 1995 inspection. Each of the transformers was marked with a PCB M_L label; however, one of the labels was a paper copy which was taped to the transformer. The EPA inspectors recommended that the paper label be replaced with a standard PCB M_L label. There were no leaks or stains observed on or around the transformers. A concrete block containment area had been constructed around the three transformers. The contained area measured approximately 344" by 208" by 8". The nameplates on all three transformer had been covered with tape or paint. The EPA inspectors recommended removing the tape/paint from the nameplates.

This building was vacant at the time of the inspection.

Building 219, Substation 24

An outdoor fenced enclosure located adjacent to building 219 contained six PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers was marked with a PCB M_L label and there were no leaks or stains observed on or around any of the transformers. Two of the six transformers were not in service at the time of the inspection. The nameplates on two of the transformers were covered with paint. The EPA inspector recommended removing the paint from the nameplates.

An indoor electrical room is located adjacent to the substation. The door to the room was locked and it was marked with a PCB M_L label. During the 1995 and 1996 EPA inspections, the EPA inspectors observed two metal cabinets which contained a total of twenty three PCB capacitors. The EPA inspectors had also observed a wet area on the floor under the cabinets during the two previous inspections and analytical results from samples collected at that time indicated high concentrations of PCBs. At the time of the current inspection, the EPA inspectors observed that the capacitors had been removed from the electrical room the leaked material had been cleaned up and the floor was freshly painted (See Photo No. 2) and according to facility personnel had been sealed.

The building was vacant at the time of the subject inspection.

Building 119, Substation 2411

This area consists of an outdoor fenced enclosure located on the corner of building 119. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. The enclosure contained two PCB Transformers. Only one of the transformers was marked with a PCB M_L label. The other transformer was marked with a label the same dimensions as the PCB M_L label, but it was covered with paint (See Photo No. 3). The facility representative, Jay Comly, placed a new label on the transformer at the time of the visit. This area is contained on

two sides by the outside walls of the building and on the other two sides by a concrete block containment structure measuring 8" high. There were no visible openings in the containment wall. There were no leaks observed on or around either of the two transformers.

Building 119 is occupied by an audio/video repair facility.

Building 120, Substation 13

An outdoor fenced enclosure is located adjacent to an indoor electrical room in building 120. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. The enclosure contained three PCB Transformers. Each of the three transformers was marked with a PCB M_L label and no leaks were observed on or around any of the three transformers. The nameplate on one of the transformers was covered with tape. The EPA inspectors recommended removing the tape from the nameplate. A concrete block containment wall 8" high and 368" long had been constructed across one side of the enclosure. The other three sides were enclosed by the outside walls of the building. During the 1995 EPA inspection, the EPA inspectors observed several drums containing new chemicals (e.g. toluene, methanol, 111- trichloroethane) stored within five meters of the transformer enclosure. At the time of the subject inspection there were no materials stored within five meters of the enclosure.

What Where Who

The doorway to the indoor electrical room adjacent to the transformer enclosure was marked with a PCB M_L label; however, there were no PCBs observed in the electrical room.

Building 120 is occupied by C-LEC Plastics Inc.

Building 120, C-LEC Plastics Inc.

Following the inspection of the building 120 transformer enclosure, the EPA inspectors, while walking past a loading dock area outside of building 120, observed a dumpster next to the building which contained five large plastic bags. One of the bags was torn and it contained what appeared to be a fine white powder (See Photo No. 13). The inspectors also observed what appeared to be the same material on the concrete around the dumpster (See Photo Nos. 14 & 15). What appeared to be water was flowing from a garden hose which extended from a garage door out to the dumpster area. The water was flowing from the hose onto the concrete and flowing into a drain located in the concrete adjacent to the metal dumpster (See Photo No. 16). Some of the white powdery material was being washed down the drain by the water flowing from the hose.

H_2O

The EPA inspectors went into the building and asked for the owner to find out what the powdery material is and also to find out what was flowing from the garden hose. The inspectors met with Mr. Mike Walsh, Vice President of C-LEC Plastics. The inspectors presented their credentials and asked Mr. Walsh about the powdery material and the garden hose. Mr. Walsh explained that the facility manufactures large plastic blocks using polystyrene. The product trade name is rexoilite 1422. Mr. Walsh said they then machine the blocks to specific shapes for sale

Constituents

to their customers. When asked about the garden hose, Mr. Walsh showed the inspectors an area inside the building where they wet sand the plastic blocks. The water and the sanding fines from this process drain into a metal container under the sanding table. The sanding fines settle out and the water drains off through the garden hose and into the drain outside the building. Neither Mr. Walsh or Jay Comly knew if the drain was connected to the city sewer or if it was a storm drain. Mr. Walsh said that the sanding fines are eventually removed from the metal container, placed in plastic bags and put into the dumpster outside for disposal. Mr. Walsh said that this was the material which we had observed in the dumpster and on the concrete around the dumpster. Mr. Walsh provided the inspector with a copy of an MSDS sheet (See Attachment No. 1) for the facility's product (rexolite). Although the MSDS sheet indicates that the material is non-toxic, it does state that proper disposal of the material would be in a landfill or burned in an adequate incinerator. The EPA inspector told Mr. Walsh that this material should not be laying on the concrete around the dumpster and certainly should not be allowed to wash down the drain adjacent to the dumpster.

Subsequent to the inspection, the EPA inspector referred this situation to Region III's Water Division.

Building 230, Substation 25

A fenced enclosure adjacent to building 230 contains four PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the four transformers was marked with a PCB M_L label. The nameplates on three of the four transformers were covered with tape or paint. The EPA inspectors recommended removing the tape/paint from the nameplates. A stain was observed on the concrete floor of the enclosure under the drain valve of one of the transformers (See Photo No. 4). There were no active leaks or other stains observed on or around any of the other transformers.

Building 230 is presently occupied by a company named Cafeco.

Building 126, Substation 15

An outdoor fenced enclosure adjacent to building 126 contains one PCB Transformer. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. The transformer was marked with a PCB M_L label. The EPA inspector observed a stain on the concrete floor of the enclosure under the transformer drain valve and tap changer (See Photo No. 5). There were no active leaks observed on the transformer. A concrete block containment wall had been constructed around three sides of the enclosure. The outside wall of building 126 formed the other side of the enclosure. The concrete block area measured 96" by 96" by 8".

The building is currently occupied by a crematory.

Building 301, Substation 31

An outdoor fenced enclosure located adjacent to building 301 contains four PCB

Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the four transformers was marked with a PCB M_L label. There were no leaks or stains observed on or around any of the transformers. A concrete block containment wall had been constructed on two sides of the enclosure. The other two sides of the enclosure consisted of the outside walls of building 301. The concrete block walls measured 240" by 240" by 8".

An indoor electrical room located adjacent to the enclosure contained a metal capacitor cabinet that was marked with a PCB M_L label; however, all of the capacitors had been removed from the cabinet and no stains were observed on or near the cabinet. This same cabinet was observed during the 1995 EPA inspection.

Building 301A

Building 301A is a quonset hut type building which is located adjacent to building 301. The building was previously used to store a large number of drums which contained PCBs. It is not known when the drums were removed; however, during the 1996 EPA inspection, samples were collected from the floor of the building in two different rooms. The results of those samples indicated high concentrations of PCBs. At the time of the 1996 inspection, the EPA inspector also observed seven capacitors stored in the building.

At the time of the subject inspection, the EPA inspector noted that the capacitors have since been removed from the building and the floor tile and concrete in the larger of the two rooms has been removed. The floor tile in the smaller of the two rooms had also been removed; however the imprints of the tiles were still visible on the concrete floor.

Building 301A was vacant at the time of the subject inspection.

Building 238, Coal Tech Corp.

While walking to the next transformer location, the inspection team passed by building 238 which is occupied by the Coal Tech Corp. Outside of the building, the EPA inspector observed a number of 55 gallon drums. There were approximately thirty-five drums, seven of which were full. The seven full drums contained a greyish, powdery material. There were no markings or labels on the drums. The EPA inspecters went into the building and met with Dr. Bert Zuaderer, President, Coal Tech Corp. Dr. Zauderer explained that the material in the drums is slag and ash generated by the facility's coal combustor unit. Dr. Zauderer further explained that his facility is engaged in a U.S. Department of Energy sponsored coal combustion R & D project. The EPA inspector asked if the material in the drums had ever been analyzed and Dr. Zauderer replied that the material periodically undergoes TCLP Leachate analysis and the results indicate that it is a non-hazardous material. The EPA inspector asked for a copy of the most recent analysis and Dr. Zauderer stated that those records were maintained in his corporate office and that he would have to mail a copy of the analysis to the EPA inspector. On December 3, 1997, the EPA inspector, Gerard Crutchley received in the mail a copy of the most recent analysis for the slag/ash material. These results indicate that the material is non-hazardous. A

copy of those results are included as an attachment to this report (See Attachment No. 2).

Dr. Zauderer also stated that the material in the drums is periodically picked up by Kasper Bros. and transported to the Grand Central Landfill in Penn Argyl, Pa.

Building 250, Substation 27

An outdoor fenced enclosure located adjacent to building 250 contains three PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the three transformers was marked with a PCB M_L label and no leaks or stains were observed on or around the transformers. The nameplate on one of the transformers was covered with tape and the EPA inspectors recommended removing the tape from the nameplate. A concrete block containment wall had been constructed around the transformers. The containment area measured 232" by 192" by 8".

An indoor electrical room located adjacent to the enclosure had previously contained a metal capacitor cabinet with eleven PCB capacitors. The capacitors and the cabinet have since been removed and the floor in the room has been freshly painted (See Photo No. 6).

Building 128, Substation 128

Substation 128 is a large fenced enclosure which contains seven PCB Transformers and serves as the facility's main substation. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the seven transformers were marked with a PCB M_L label and no leaks were observed on or around any of the transformers. A concrete block containment wall had been constructed around the seven transformers which measured approximately 840" by 448" by 8 ".

Building 128 contains the main switchgear for the distribution of electrical power throughout the facility. During the 1995 EPA inspection, a large pole type transformer had been observed inside of building 128. This transformer has since been removed from the building. During the subject inspection, the EPA inspector observed a locked room which facility personnel said is used for storage. The doorway to the room was marked with a PCB M_L label. The facility representative unlocked the door and the inspectors observed that the only thing in the room was asbestos related cleanup materials (bags, labels, etc.). The facility representative said that he had no idea why the door was marked with a PCB label. The inspectors recommended that the label be removed from the door. The facility representative immediately removed the label from the door.

Buildings 247 & 248

Buildings 247 and 248 are concrete bunker type buildings where, during the 1996 EPA inspection, the EPA inspectors had observed a number of fifty-five gallon drums stored inside the buildings. At that time, Mr. Hankin said that he thought the drums came from another facility (Old York Rd. Bank) and they allowed the other facility to store them in the bunker

buildings.

At the time of the subject inspection, the EPA inspectors returned to these buildings and observed the same drums still in storage. Building 248 contained seven 55 gallon drums which were empty. Building 247 contained a number of 55 gallon drums, four in a front room and twenty seven in a back room. The back room also contained six old gas cylinders. The drums and the gas cylinders appeared to be in the same location as they were during the 1996 inspection. It was also noted that a number of fluorescent light ballasts observed during the 1996 inspection had been removed from the building.

Building 149, Substation 16

An outdoor fenced enclosure adjacent to building 149 contains three PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the three transformers were marked with a PCB M_L label and no leaks or stains were observed on or around any of the transformers. A concrete block containment wall had been constructed around the transformers which measured approximately 552" by 136" by 8".

At the time of the 1995 EPA inspection, building 149 was occupied by a company named "Bowmasters". This company operated an archery supply store and an indoor archery range which was accessible to the general public. This would classify the building as a "commercial building" as defined in the PCB Rule and would require the installation of enhanced electrical protection to prevent transformer ruptures due to electrical faults in the transformer. Since that time Bowmasters has moved out of the business center and the building is now occupied by a company named Chem Group Inc.

Building 55, Substation 5

An outdoor fenced enclosure located adjacent to building 55 contains six PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the six transformers was marked with a PCB M_L label; however, the labels on three of the six transformers were paper copies taped to the transformers. The EPA inspectors recommended replacing the paper labels with standard PCB labels. The facility representative immediately replaced the three labels. A concrete block containment wall had been constructed around all of the transformers and a brick containment had been constructed around a manhole located in the substation. At the time of the subject inspection four of the transformers were not in service. Building 55 was vacant at the time of the inspection.

Building 64, Substation 7

An outdoor fenced enclosure adjacent to building 64 contains six PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the six transformers were marked with PCB M_L labels. The nameplates on several of the transformers had been covered with paint and the EPA inspectors recommended removing the paint from the nameplates. A concrete block containment wall had been constructed around the

transformers which measured approximately 560" by 96" by 8". No leaks or stains were observed on or around any of the transformers.

Building 64 was vacant at the time of the inspection.

Building 48, Substation 6

An outdoor fenced enclosure located at the corner of building 48 contains four PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the four transformers were marked with a PCB M_L label; however, the labels had been placed over the nameplates on two of the transformers and a paper label had been taped to another of the transformers. The EPA inspectors recommended removing the labels which had been placed on the transformer nameplates and placing them on the sides of the transformers. The EPA inspectors also recommended replacing the paper label with a standard PCB label. A concrete block containment wall had been constructed around the transformers which measured approximately 256" by 192" by 8". No leaks or stains were observed on or around any of the transformers.

Building 48 is a multi-tenant building.

Building 47, Substation 4

An outdoor fenced enclosure located adjacent to building 47 contains three PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers were marked with a PCB M_L label. The nameplate on one of the transformers had been covered with paint and the EPA inspectors recommended removing the paint from the nameplate. No leaks or stains were observed on or around any of the transformers. A concrete block containment wall had been constructed around the transformers which measured approximately 272" by 120" by 8".

An indoor electrical room was located adjacent to the substation. The door to the room was locked and it was marked with a PCB M_L label. Two metal capacitor cabinets each containing twelve PCB capacitors were located inside the room. The serial nos. On the cabinets were 94816 & 94817. Each of the capacitors were marked with a PCB M_L label and no leaks or stains were observed on or near the capacitors. The capacitors were all rated at 460 volts.

Building 47 was empty at the time of the inspection.

Building 44, Substation 401

An indoor electrical room located in building 44 contains one PCB Transformer. The entrance door to the room was locked and it was marked with a PCB M_L label. A concrete block wall, eight inches high had been constructed across the entrance way. No leaks or stains were observed on or near the transformer.

Building 44 is occupied by Hotel Furniture Liquidators.

Building 55, electrical room

An electrical room located inside of building 55 contains six metal capacitor cabinets. The entry door to the room was locked and it was marked with a PCB M_L label. Three of the cabinets contained Aerovox, PCB capacitors, serial nos. 4381314, 4381299, & 4381310. A total of thirty six capacitors were in these three cabinets and each capacitor was marked with a PCB M_L label. The other three capacitor cabinets contained a total of thirty-two Cornell Dublier, PCB capacitors, serial nos. 94812, 94814, & 94815. Each of the capacitors was marked with a PCB M_L label. All of the capacitors in the room were rated at 460 volts and no leaks or stains were observed on or near the capacitors.

Building 112, Substation 12

An outdoor electrical substation located adjacent to building 112 contained two PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers was marked with a PCB M_L label. A concrete block containment wall had been constructed around the transformers which measured approximately 136" by 88" by 8". No leaks or stains were observed on or near either of the transformers.

Building 112 was vacant at the time of the inspection.

Later in the day while reviewing the field notes, the EPA inspector noted that the two transformers listed for this location had originally been listed as being at building 215, substation 23. It was also noted that the facility's PCB monthly report from the 1995 inspection listed building 112, substation 12 as containing only one transformer. The EPA inspectors were not able to clarify this discrepancy during the subject inspection.

Building 39, Substation 201

An indoor electrical room located in building 39 contained one PCB Transformer. The entry door to the room was locked and it was marked with a PCB M_L label. The PCB Transformer was marked with a PCB M_L label and no leaks or stains were observed on or around the transformer. A concrete block containment wall had been constructed across the doorway to the room and around an electrical conduit manhole in the floor of the room.

Building 39 is occupied by the New Huntingdon Development Corporation.

Building 120, Substation 13

The EPA inspectors returned to building 120 to check an electrical room located adjacent to the substation. The entry door to the room was locked and it was marked with a PCB M_L label; however, there were no PCBs or PCB Items observed inside the room.

After leaving building 120, the EPA inspectors returned to the business center's office to meet again with Mr. Hankin to provide him with a summary of that day's activities. During the meeting, Mr. Hankin said that he had contacted Mr. Fellheimer's office and was told that there were six full boxes of records at that office. Mr. Hankin then said that he would have the records delivered to the business center on the following day so they would be available for inspection.

The EPA inspector provided a brief description of the day's activities to Mr. Hankin and informed of the areas where discrepancies were observed (e.g. locations where labels were missing or painted over, and areas where stains were observed near PCB Transformers). The EPA inspector, Gerard Crutchley, also told Mr. Hankin about the drums which were still located in building 247 and 248. Mr. Hankin replied to this by saying that he thought those drums had been removed from the facility.

10/23/97

The EPA inspectors arrived at the facility at 0800 and met with Mr. Jay Comly to continue the tour of the subject facility.

Building 150, Substation 17

An indoor electrical room located on the second floor of building 150 contains four PCB Transformers. The first floor entry door was locked and was marked with a PCB M_L label. The second floor entry to the electrical was also locked; however it was not marked with a PCB label. Each of the four transformers were marked with a PCB M_L label. The EPA inspectors observed a stain on the concrete floor under the drain valve of a Niagra transformer, serial no. 26205 (See Photo No. 7). The stain appeared to be wet indicating that the leak may have recently occurred.

The EPA inspectors also observed two metal capacitor cabinets in the electrical room. Each cabinet contained nine PCB capacitors. Each of the capacitors was marked with a PCB M_L label and there were no leaks or stains observed on or near the capacitors.

A concrete block containment wall, eight inches high, had been constructed across the entrance to the room. Building 150 was vacant at the time of the inspection.

Building 28, Substation 1101

An outdoor fenced enclosure located adjacent to building 28 contains two PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Only one transformer was marked with a PCB M_L label. Transformer no. 3360 was marked with a label the same dimensions as the PCB M_L label; however it had been covered with paint and the nameplate on the other transformer had also been painted over. The EPA inspectors told the facility representative that a new PCB label needed to be placed on the transformer and they recommended removing the paint from the transformer nameplate. A concrete block containment wall had been constructed around the transformers which measured

approximately 136" by 112" by 8". There were no leaks or stains observed on or near either of the transformers.

Building 28 was vacant at the time of the inspection.

Building 108, Substation 11

An outdoor fenced enclosure covered by a roof and located adjacent to building 108 contains five PCB Transformers. The entry gate to the enclosure was locked and the enclosure was marked with a PCB M_L label. Each of the transformers were marked with a PCB M_L label and no leaks or stains were observed on or around the transformers. Part of the tin/wood roof had collapsed and two pieces of wood were hanging down within a foot of one of the PCB Transformers. The EPA inspectors told the facility representative that the wood needed to be removed from the substation. A concrete block containment wall had been constructed around the transformers which measured approximately 304" by 184" by 8 ". A nameplate on one of the transformers was covered with tape. The EPA inspectors recommended removing the tape from the nameplate.

Building 108 was vacant at the time of the inspection.

Building 12, Substation 1

An indoor electrical room located in building 12 contains two PCB Transformers. The door to the electrical room was locked and it was marked with a PCB M_L label. Both of the transformers were marked with a PCB M_L label and no leaks or stains were observed on or near either of the two transformers. A concrete block containment wall eight inches high had been constructed across the doorway to the electrical room.

The electrical room is divided into two halves, each having a separate entrance door. The other side of the room contained a metal capacitor cabinet that was marked with a PCB M_L label. The cabinet was completely enclosed and the EPA inspectors could not determine how many capacitors were mounted in the cabinet; however, based on the physical size of the cabinet it appeared that it could hold about six capacitors. The nameplate on the cabinet indicated that the capacitors were rated at 460 volts and the serial no. is 94813.

Building 12 was not occupied at the time of the inspection.

Building 215, Substation 23

The EPA inspectors returned to this location at the request of the facility personnel who wanted the inspectors to see that they had begun to remove the paint/tape from the transformer nameplates.

The approximate measurements of the concrete block containment walls observed at a number of the transformer locations were based on a count of the number of concrete blocks

needed to form the sides of the walls at the various locations. The EPA inspector then used the measurements of a standard concrete block (8" x 8" x 16") to determine the approximate measurements of the wall at each location. The following table contains a listing of each transformer location where a containment wall had been constructed as well as the capacity in gallons for each location and the total amount of PCB fluid in gallons for each location.

PCB Transformer Locations	Approximate measurements of contained area	Capacity in gallons of contained area	Gallons of fluid in PCB Transformers
Bldg. 202, substation 20	83.2 cu. ft.	622	790
Bldg. 210, substation 22	130.9 cu. ft.	979	858 (PCB), 180 (PCB Contaminated)
Bldg. 215, substation 23	332.7 cu. ft.	2489	810
Bldg. 126, substation 15	42.9 cu. ft.	321	285
Bldg. 301, substation 31	268.0 cu. ft.	2005	1120
Bldg. 250, substation 27	206.9 cu. ft.	1548	769
Bldg. 128, substation 128	1749.4 cu. ft.	13,086	10,717
Bldg. 149, substation 16	348.3 cu. ft.	2605	790
Bldg. 64, substation 7	250.3 cu. ft.	1872	1286
Bldg. 48, substation 6	228.3 cu. ft.	1708	1040
Bldg. 47, substation 4	152.1 cu. ft.	1138	528
Bldg. 112, substation 12	55.3 cu. ft.	414	
Bldg. 28, substation 1101	70.4 cu. ft.	527	
Bldg. 108, substation 11	259.4 cu. ft.	1940	1311

Sample Collection

At the completion of the facility tour, the EPA inspectors returned to several locations to collect samples where stains/leaks had been observed during the tour. The following table contains a description for each sample location and the analysis requested for each sample:

Sample No.	Sample Description/Location	Analysis
WB	Wipe Blank	PCB
ABC-15	Building 230, Substation 25, wipe sample from stain on concrete under drain valve of transformer # 2. (Photo no. 8)	PCB
ABC-16	Building 126, Substation 15, wipe sample from stain on concrete under drain valve of transformer no. 1314-1. (Photo no. 9)	PCB
ABC-17	Building 150, Substation 17, wipe sample of stain/residue on concrete under drain valve of transformer no. 26205. (Photo no. 10)	PCB
ABC-18	Building 301A, wipe sample from floor in smaller room of building (Photo No. 11).	PCB
247-1	Sample from 55 gallon drum, outside hallway	PCB, FTIR Scan
247-2	Sample from 55 gallon drum, back room of building	PCB, FTIR Scan

The EPA inspector used a laboratory towel saturated with hexane to collect the wipe samples. A standard size template (10 cm by 10 cm) was used to delineate the area of each wipe sample. Although duplicate samples cannot be collected when wipe sampling, the EPA inspector used templates placed side by side at each sample location so as to provide the facility with a split sample; however, at building 150, the stained sample area was only 1 to 2 inches in diameter and the EPA inspector had to wipe this area twice in order to provide a split sample for the facility. Following the collection of the wipe samples, the EPA inspectors returned to building 150 at the request of facility personnel who stated that they had repaired the leak on transformer no. 26205.. Upon returning to this location, the EPA inspectors observed that a sealant had been placed on the transformer sample tap and drain valve (See Photo No. 12). It was not known if they cleaned the floor under the drain valve.

The samples from the two drums at building 247 were collected utilizing a clean glass coliwassa sampler for each drum.

A sample of the white powdery material next to the dumpster at C-LEC Plastics was also collected; however, this sample was not analyzed. The decision not to analyze the sample was based on a review of the MSDS sheet provided for the material.

All of the samples remained in the custody of the EPA inspector (Gerard Crutchley) and were returned to the EPA laboratory in Annapolis for analysis.

Analytical Results

The following table contains the PCB analytical results from the wipe samples collected during the inspection. Also included in the table are the regulatory limits taken from the PCB

Spill Cleanup Policy.

Sample No.	Sample Description	Sample Results ug/wipe	Regulatory Limit ug/100 cm^2
WB	Wipe Blank	Not Detected	-------
ABC-15	wipe sample, stain on floor of substation in building 230	2,014	100
ABC-16	wipe sample, stain on floor of substation in building 126	492	100
ABC-17	wipe sample, stain on floor of electrical room in building 150	112,900	10
ABC-18	wipe sample, concrete floor in smaller room of building 310A	5.26	10

The samples collected from the two drums located at building 247 were analyzed for PCB content; however, no PCBs were detected in either of the samples. The laboratory also analyzed both samples for component identification using FTIR (FOURIER Transform Infrared) scans combined with library search programs. Results of this analysis indicated that spectra of both samples did match some of the known gear oil/hydraulic oil spectra in the Nicolet Oil Spectra Library. This indicates that the materials sampled are probably nothing more than waste oils.

Copies of the analytical results are included as attachments to this report (See Attachment Nos. 3 & 4).

Closing Conference

Following the tour of all areas and the collection of all the samples, the EPA inspectors returned to the facility's office to review any records which might be available regarding the PCBs and PCB Items at the facility. At this time the inspectors had also planned to provide facility personnel with a summary of the preliminary findings from the inspection. Upon returning to the office, Mr. Hankin met the inspectors and told them that he would be unable to meet with them because of a prior commitment; however, he had asked Mr. Michael Markowitz, Vice President to meet with the inspectors for the record review.

A number of cardboard boxes containing records had been brought to the office from Mr. Alan Fellheimer's law office. Prior to beginning, Mr. Markowitz requested that he be allowed to record on audio tape, the record review and closeout meeting. The EPA inspectors agreed to the session being taped. Mr. Markowitz said that he could not allow the inspectors to look at all of the records because some of the boxes may contain confidential material. He did say that he

would look through each box and tell the inspectors what it contained and if there were records the inspectors needed to review, he would pull those records out of the box for review. The first box contained mostly correspondence; however, there was one file which contained copies of PCB manifests. The EPA inspector, Gerard Crutchley requested to review that file. Mr. Markowitz did pull that file out of the box and hand it to the inspector. The inspector had looked at approximately half the records contained in the file when Mr. Markowitz reached out and retrieved the file. Mr. Markowitz said that the file contained confidential information. At that point, Mr. Markowitz said that he would look through the boxes containing the records and make a decision on which records he would allow the inspectors to review. After some further conversation, the EPA inspector, Gerard Crutchley, told Mr. Markowitz that he could not conduct a thorough record review without being allowed direct access to the records in the boxes.

Mr. Markowitz said that it would probably be better if the inspectors drafted a letter to the facility and requested the specific records which were needed to complete the record review. Prior to leaving, Jose Jimenez requested that the inspectors be provided with a copy of the taped record of the record review and closeout meeting. Mr. Markowitz denied his request.

Subsequent to the inspection (November 10, 1997), the EPA inspector, Gerard Crutchley, sent a letter to the facility requesting copies of the facility's 1995 & 1996 Annual Document Logs, copies of all PCB Transformer quarterly inspection records for 1996 & 1997 and clarification as to who actually conducts the quarterly inspections (See Attachment No. 5).

The request letter was apparently forwarded to the facility's legal representatives who reponded in a letter dated Decmber 5, 1997. The response indicated that these records have already been supplied to EPA at least twice and they believe it is unreasonable to copy these records for a third time. They did however, state that we could travel to their offices to select records for copying and then have them copied at EPA's expense (See Attachment No. 6).

Summary of Findings

EPA Region III's Facility Inspection Program received a request from Region III's Waste and Chemical Management Division to conduct a TSCA/PCB and a RCRA/CEI inspection at the Arsenal Business Center located in Philadelphia, Pennsylvania. The inspection was conducted on October 22 & 23, 1997 by Gerard Crutchley, Environmental Protection Specialist, ESD and Jose Jimenez, Chemical Engineer,WCMD. Following is a listing of the findings from the inspection:

TSCA/PCB

1. Four PCB Transformers were marked with labels having the same dimensions as the PCB M_L label; however they were covered with paint. The facility personnel did replace these labels during the subject inspection.

2. The doorway into a electrical room containing PCB Transformers on the second floor of building no. 150 was not marked with a PCB M_L label.

3. At eleven different substations, the EPA inspectors observed that the manufacturers nameplates on PCB Transformers had been covered with paint or tape. Although not a regulatory issue, the inspectors recommended to facility personnel that the paint/tape be removed from the nameplates so that the information on the nameplates could be easily read.

4. PCB Transformers at three different locations were marked with paper labels which were copied from a PCB M_L label. These labels do not meet the specifications of the M_L mark as defined by the PCB Rule.

5. Part of the roof covering a PCB Transformer enclosure (building 108, substation 11) had collapsed and in doing so had left broken pieces of wooden lumber hanging adjacent to a PCB Transformer. The EPA inspectors told facility personnel that the broken lumber needed to be removed because it is considered to be combustible material.

6. The EPA inspectors observed leaks or evidence of leaks (stains) from PCB Transformers at three different locations. The analytical results from wipe samples collected for PCB analysis at the three locations indicate PCB levels which exceed the regulatory limits specified in the PCB Spill Cleanup Policy.

7. The doorway into a storage room inside of building 128 was marked with a PCB M_L label. At the time of the inspection, there were no PCBs in the room and the EPA inspectors recommended that the label be removed from the door.

8. The EPA inspectors were unable to determine the facility's compliance with PCB Recordkeeping requirements because they were not allowed direct access to the records at the time of the inspection

Multi-Media Inspection
(RCRA, UST, CWA, & TSCA/PCB)

Arsenal Associates
(Frankford Arsenal)
5301 Tacony Street
Philadelphia, Pennsylvania

Date of Inspection: April 2 - 3, 1996

EPA Representatives:	Gerard Crutchley Environmental Protection Specialist
	Mike Cramer EPA, Region III Hazardous Waste Division
Facility Representatives:	Mr. Mark Hankin Owner
	Mr. Alan Fellheimer Attorney at Law, Fellheimer, Eichen, Braverman & Kaskey
	Frank Dellmyer New Huntingdon Development
City of Philadelphia Fire Department:	Lt. Robert Kelly Hazardous Materials Administration Unit
	Lt. Tom Leonard Hazardous Materials Administration Unit
City of Philadelphia Water Department:	Joseph Morrow Supervisor, Industrial Waste Unit
	James D'Agostino Inspector, Industrial Waste Unit

Opening Conference

The EPA inspection team arrived at the facility at 1100 on April 2, 1996 and met with Mr. Mark Hankin, Owner, Arsenal Associates and Mr. Alan Fellheimer, Attorney At Law, Fellheimer, Eichen, Braverman & Kaskey. The inspectors presented their credentials to the facility representatives and Mr. Crutchley then explained the purpose of the inspection to Mr. Hankin and Mr. Fellheimer. Mr. Crutchley also presented and explained to Mr. Hankin the TSCA Notice of Inspection and the TSCA Inspection Confidentiality Notice. Mr. Hankin read and signed both forms. A copy of each form was retained by Mr. Hankin.

The EPA inspector (Gerard Crutchley) asked Mr. Hankin to describe activities at the facility which generated any type of waste materials (hazardous and non-hazardous). Mr. Hankin said that the only ongoing activity at the facility is building/office renovation. Waste materials generated from this activity include scrap lumber and drywall. Painting of renovated offices is done by sub-contractors, who remove their own waste (e.g. paint cans, rags). The renovation of some buildings involves asbestos removal and according to Mr. Hankin, this work is conducted by contractors and they handle any waste removal. Mr. Hankin said that the only other work which occurs at the facility is general maintenance work (groundskeeping, replacing broken windows, etc;).

According to Mr. Hankin, the tenant facilities are responsible for their own waste management as per the lease agreement (See Attachment No. 9, page 28). Mr. Hankin stated that he has not had any problems with tenant facilities regarding waste generation or mishandling of wastes.

Mr. Hankin said that to his knowledge there are no underground storage tanks located at the facility. He said the facility uses natural gas versus heating oil to supply heat to buildings on site. He said there are six aboveground tanks which will be removed by the Army Corp of Engineers as part of a defense cleanup plan. Mr. Hankin said that as far as he knows the only other tank on site is an above ground tank containing diesel fuel for the facility's maintenance equipment. He said that the company that supplies the diesel fuel also owns the tank.

Mr. Hankin said that he is not aware of any discharges to the Delaware River or the Frankford Inlet from the facility. There is no portion of the facility with frontage on the Delaware River. According to Mr. Hankin the stormwater drainage system was built by the U.S. Army and it discharges to the Frankford Inlet. The Frankford Inlet was once a part of Frankford Creek, but the creek was redirected and now the inlet is a tidal backwash.

According to Mr. Hankin and the representatives from the City of Philadelphia Water Department, the only facility on site that discharges waste to the city sewer system is a company named Col Tec in building no. 238. This facility is permitted by the city

under their pretreatment program for the discharge of quench water and scrub water. At the time of the inspection, the facility was only discharging boiler water to the city sewer system.

Following this, Mr. Hankin described briefly the incident which occurred at the facility several years ago involving a company called Multi Flow. Multi Flow, a tenant at the facility, sold and/or distributed soda dispensers and soda syrups. The company was housed in building no. 124 and allegedly was washing soda syrup containers in a containment pad with floor drains that discharged to the Frankford Inlet. The company apparently did not have any permits allowing such a discharge. A criminal investigation was initiated in September, 1994. Multi Flow moved out of the business center in 1994. Mr. Hankin stated that his on-site contractors (New Huntingdon Development) had conducted a dye test on the drains in the building and the results indicated that the flow in the drains discharged to the city's sanitary sewer system. A dye test conducted by the City of Philadelphia's Water Department as part of the criminal investigation indicated the drains discharged to the Frankford Inlet.

At the time of the subject inspection, there was some discussion between the City of Philadelphia representatives and facility personnel (specifically Frank Dellmyer, of New Huntingdon Development) regarding how the dye tests were conducted and they also reviewed sewer maps which had been prepared by the U.S. Army when the facility was owned by the federal government.

Inspection Observations

Following the opening conference and the discussions regarding the dye tests, the EPA inspection team accompanied by facility personnel began a tour of the business center. Specific areas which were visited during the tour included, but were not limited to, building no. 124, a number of transformer locations where leaks had been observed on PCB Transformers during the previous EPA inspection conducted in December, 1995 and also the area where sixty drums of PCB fluids had been stored prior to removal from the site. Following are the observations noted at each of the areas visited during the tour:

Building No. 124

Building no. 124 where the containment pad is located is currently occupied by a stone mason company (Arsenal Marble & Granite, Inc.). The inspection team entered the building and met with Mr. Bill Staerk, representative for Arsenal Marble & Granite, Inc. They presented their credentials to Mr. Staerk, explained the purpose of the visit and asked Mr. Staerk for permission to enter the facility to observe the concrete pad and the drain connections in the basement of the building. The current tenant was using the containment pad area for cutting, grinding and washing stone. In the contained area, the EPA inspector observed

three floor drains (See Photo No. 1). These floor drains were connected to drain pipes located in the basement of the building (See Photo No. 2). The city water department personnel told Mr. Staerk that if the flow from the containment pad discharged to the Frankford Inlet, the drain lines would have to be reconfigured to direct the flow to the sanitary sewer system and they would have to install some type of sand/sediment trap to collect any solid material generated by the activities in the containment area.

Following the tour of this building, the inspection team moved outside the building into the street area to observe the sewer system in the street through the various manholes located in the street. The inspection team observed five manholes adjacent to building nos. 124 & 235/301A. Frank Dellmyer described what he had observed in those manholes when he conducted his dye test. At this point it was decided by the city water department personnel that they would conduct a new dye test the following day (4/3/96) to resolve any doubts as to where the flow in these drains was directed.

Building No. 301A

The EPA inspector (Gerard Crutchley) asked Mr. Dellmyer where the sixty drums of PCBs had been stored prior to shipment off-site in November, 1995. Mr. Dellmyer stated that the drums had been located in building no. 301A. Building no. 301A is a quonset hut style building which is divided into two separate rooms. In the larger of the two rooms, the EPA inspector observed a number of circular impressions in the tile floor (See Photo No. 3). These impressions appeared to have been caused by 55 gallon drums being stored for a long period of time. The floor was also stained in several areas and a tar like residue was observed along the edges of some of the circular impressions. Along one side of the room, the EPA inspector observed seven electrical capacitors (See Photo No. 4). The nameplates on the capacitors indicated that they were Cornell Dublier capacitors, each containing 1.5 gallons of non-inflammable liquid. None of the capacitors were labelled and no leaks were observed on or around the capacitors. Mr. Dellmyer stated that he was not aware these capacitors were in the building. On the other side of the large room, the EPA inspector observed a 55 gallon metal drum (See Photo No. 5). The drum appeared to be full and markings on the drum indicated that it contained hydraulic oil - AW/RSO. The large room also contained some old electrical switchgear equipment, none of which contained any oil. An old bathroom in one corner of the large room contained a large number of nicad batteries (See Photo No. 7). Mr. Dellmyer said that he did not know why the batteries were in the room, or where they came from.

In the smaller of the two rooms, the EPA inspector observed the same circular impressions in the tile floor (See Photo No. 6). The floor was stained and the same type of tar like residue was observed along the edges of some of the circular impressions.

Just inside the doorway to the building, the inspection team observed approximately one hundred old cannonballs.

Building No. 235

After leaving building no. 301A, the inspection team proceeded to building no. 128. While walking to building no. 128, the EPA inspector observed an out of service transformer located outside and adjacent to building no. 235 (See Photo No. 8). According to facility personnel, a former tenant of building no. 235, Forest Electric Co., had left the transformer next to the building. The transformer was sitting on a concrete pad and it was marked with a blue label indicating it contained less than 50 PPM PCBs. The transformer nameplate indicated that it was a Wagner Electric transformer, serial no. J9B1636 containing 112 gallons of oil. Although the transformer was marked with the non-PCB label, the facility did not have any documentation (test results) to support the non-PCB status of this transformer. No visible leaks or stains were observed on or around the transformer.

Building No. 128

As previously described, when the inspection team began the tour of the subject facility the first location visited was building no. 124. Upon leaving building no. 124, the inspection team was standing in the street waiting for facility personnel to remove manhole covers to observe the sewer system. While waiting on the facility personnel, Gerard Crutchley observed the fenced substation area behind building no. 128 which was located across an open lot from building 124 approximately several hundred yards away. In the substation, Mr. Crutchley observed a fifty five gallon drum which appeared to be the same drum that was observed during the December 1995 inspection and subsequently identified (sample results) as containing PCBs at a concentration of 190,000 PPM. While observing the drum, Mr. Crutchley pointed out the drum to Lt. Robert Kelly of the Philadelphia Fire Department and commented to him that it appeared to be the same drum that was observed during the December inspection and the fact that it had not yet been moved and properly disposed of.

After making this observation, the inspection team proceeded towards the other manholes located in the street on the other side of building no. 235 and in doing so were not able too see building no. 128. After observing the manholes and inspecting building no. 301A, the inspection team proceeded towards building no. 128 and the substation located behind the building. As the inspection team approached the substation, Mr. Crutchley observed that the drum observed approximately one half hour before was now gone. Mr. Crutchley immediately questioned Mr. Hankin and Mr. Dellmyer to determine what had happened with the drum. Both Mr. Hankin and Mr. Dellmyer stated that they did not know anything about the drum. Joe Morrow of the city water department stated that he had observed someone wearing a tyvek suit in the substation just shortly before we arrived at building no. 128. The inspection team observed an

area on the ground just outside of the fenced substation adjacent to the entry gate to the substation. The soil area directly below the gate was visibly stained (See Photo No. 9 & Diagram No. 2); however, it appeared that it had been there for a period of time. The stained area did have a distinct solvent like odor, the same odor as detected in the drum discovered during the December inspection. Approximately three feet from the stained area, the inspectors observed what appeared to be small tire tracks in the soil (See Photo No. 10). These tracks appeared similar to tire tracks that would be made by a handtruck carrying a heavy load. While the inspectors were observing the stained area, Mike Cramer said that he observed Mr. Hankin following someone into building no. 128. Mr. Cramer stated that he entered the building and heard Mr. Hankin telling two employees to "get out of here, get lost". Mr. Crutchley entered the building and asked the two employees if they had moved the drum from the substation. One of the employees (Edward O'Flynn) stated that they had moved the drum to another location. Mr. Crutchley asked them if they were told by anyone to move the drum. Mr. O'Flynn said that no one told them to move the drum, they were just performing their normal duties of cleaning up areas and he said the drum contained trash. Mr. Crutchley asked Mr. O'Flynn if he always wore a tyvek suit when he cleaned up trash. Mr. O'Flynn stated that he just wore the suit to keep his clothes clean. Mr. Crutchley asked Mr. O'Flynn where the drum was moved to and Mr. O'Flynn replied it was moved to building no. 39.

The inspection team then proceeded to building no. 39. According to Mr. Hankin, building no. 39 houses a warehouse and the New Huntingdon Development Corporation's maintenance shop. Upon arriving at the building, the inspection team observed the drum outside of and adjacent to the building (See Diagram No. 3 & Photo No. 11). There was no lid on the drum and there were no labels on the drum. The drum appeared to contain the same material (five gallon plastic pail, garden hose, tyvek suit and other debris) that was observed in the drum at substation no. 128 during the December inspection, with the addition of approximately three to four inches of water (See Photo No. 12). The water had an oily sheen and Mr. Crutchley noted the same distinct solvent like odor as detected during the December inspection coming from the drum. Mr. Crutchley told Mr. Hankin that the drum contained PCBs at a concentration of 190,000 PPM and that he should have the drum moved immediately to a secure storage area and also make arrangements to have the drum and its contents disposed of properly. Mr. Hankin was also told that the drum should be closed and labelled.

Following the observations at building no. 39, the inspection team returned to building no. 128. A large room inside of building no. 128 contained six 55 gallon drums (See Photo No. 13). These drums were first observed during the December 1995 inspection. Four of the drums were constructed of metal and were marked the name "Symons". According to the label this material was some type of sealant. The fifth drum was also constructed of metal and was

marked with the name "Kauffman". The label on this drum indicated that it contained concrete curing and sealing compound. The sixth drum was a blue plastic drum that was marked with the name "Rheobuld 1000". The bung in the top of the drum was missing and the EPA inspector could see that the drum was about 2/3 full of a dark liquid. The doorway into a smaller storage area where Mr. Crutchley and Lt. Robert Kelly had observed paint cans during the December inspection was locked at the time of the subject inspection. Mr. Hankin stated that the paint and other materials in the room were good materials that were used by on-site contractors.

Building No. 55, Substation No. 5

This area is an outdoor fenced area containing six PCB Transformers. Since the December 1995 inspection, a PCB ML label has been placed on the fence surrounding the area. All six transformers had been freshly painted and according to Mr. Hankin any leaks on the transformers were repaired by General Electric before the transformers were painted. The oily and stained absorbent materials observed on the concrete around the transformers during the December inspection have not yet been cleaned up. In addition, the contained concrete area was covered with a skim of water that was mixed with the absorbent material and some paint from when the transformers were painted (See Photo No 14).

Building No. 64, Substation No. 7

Substation no. 7 is an outdoor fenced area covered by a roof which contains six PCB Transformers. During the December inspection, four of these transformers were identified to be leaking or had leaked in the past and the fenced enclosure was not marked with a PCB ML label. At the time of the subject inspection, all six transformers had been freshly painted and a PCB ML label had been placed on the enclosure (See Photo No. 15). According to Mr. Hankin, any leaks or stains on the transformers were cleaned up before they were painted. Stains and/or residue observed on the concrete floor during the December inspection had not yet been cleaned up. No leaks were observed on any of the six transformers.

Building No. 48, Substation No. 6

Substation no. 6 is an outdoor fenced area which contains four PCB Transformers. During the December inspection it was noted that the fence was not marked with a PCB ML label and at least one leak was identified on one of the transformers. At the time of the subject inspection three of the four transformers had been freshly painted and a PCB ML label had been placed on the fenced enclosure (See Photo No. 16). Mr. Hankin said that prior to being painted, any leaks identified on the transformers were repaired by General Electric. No leaks were observed on any of the four transformers.

Building No. 47, Substation No. 4

Substation no. 4 is an outdoor fenced area which contains three PCB Transformers. At least two of the transformers were identified as leaking during the December inspection and at that time the fence was not marked with a PCB ML label. At the time of the subject inspection, two of the transformers had been freshly painted and a PCB ML label had been placed on the fence (See Photo No. 17). No leaks were observed on the transformers. Stained areas on the concrete floor of the area had not yet been cleaned up.

Building No. 119, Substation No. 2411

Substation no. 2411 is an outdoor enclosed area which contains two PCB Transformers. During the December inspection, it was noted that the enclosure was not marked with a PCB ML label and leaks were observed on both transformers. At the time of the subject inspection, one of the transformers had been freshly painted (See Photo No. 18) and Mr. Hankin stated that the leaks on both transformers had been repaired by General Electric. It was also noted that the enclosure is now marked with a PCB ML label. No leaks were observed on the transformers; however, the stains on the floor have not yet been cleaned up.

Building No. 219, Substation No. 24

Substation no. 24 is an outdoor fenced area which contains six PCB Transformers. At the time of the December inspection, the fenced area was not marked with a PCB ML label and a large pile of wooden pallets and cardboard were observed next to the transformer enclosure. At the time of the subject inspection, five of the six transformers had been freshly painted and a PCB ML label had been placed on the fence (See Photo No. 19). It was also noted that the large pile of wooden pallets and cardboard were still piled next to the transformer enclosure (See Photo No. 20). The following day Mr. Hankin informed Mr. Crutchley that the pile of pallets and cardboard had been removed. This was verified by Mr. Crutchley.

As the inspection team completed the tour and were returning to the main office, Mr. Crutchley noted that a transformer enclosure containing PCB Transformers located near building no. 212 at the intersection of Craig and Montgomery streets was not marked with a PCB ML label.

4/3/96

On the morning of April 3, 1996, the representatives from the City of Philadelphia's Water Department accompanied by facility personnel began a dye test of the drainage pipe system from building no. 124 (Arsenal Marble & Granite, Inc.). The results of

the test indicate that the flow from the contained area inside of the building is discharged to the Frankford Inlet. Subsequent to the dye test, the City of Philadelphia sent a letter to Arsenal Marble & Granite, Inc. informing them of the results of the dye test and ordering them to discontinue use of the discharge pad in its present configuration and to redirect the flow to the sanitary sewer connection in the building. The letter further instructed the facility that they would need to install pretreatment on the flow in the form of sand/sediment interception for all of the grinding, cutting and washing areas in the shop. A copy of this letter is provided as an attachment to this report (See Attachment No. 12).

Building No. 12, Substation No. 1

Substation No. 1 is an indoor electrical room containing two PCB Transformers. The room is divided in half by electrical switchgear and separate entry doors allow access to each half of the room. During the December inspection, facility personnel were unable to open the door into the one half of the room that contained the two transformers and the EPA inspectors were unable to inspect the two transformers. At the time of the subject inspection, Mr. Crutchley asked Mr. Hankin if they had ever gained access to the room and Mr. Hankin said that the door was fixed. The EPA and fire department personnel accompanied by facility personnel went to the electrical room to inspect both transformers.

The entry door into the electrical room was marked with a PCB ML label. The room contained two transformers both of which were marked with a PCB ML label. The nameplate on one of the transformers indicated that it was a Central transformer, serial no. 2434-5, containing 270 gallons of Askarel. The nameplate on the other transformer indicated that it was a Larkin Lectra transformer, serial no. L-1582, containing 285 gallons of Askarel. No leaks were observed on or around the transformers and no combustibles were observed in or near the electrical room.

Sample Collection

The EPA representative, Gerard Crutchley accompanied by Mike Cramer, Lt. Robert Kelly, Lt. Tom Leonard and facility personnel then began the collection of samples from a number of locations throughout the facility. All of the samples were collected by Mr. Crutchley and the samples were split with facility personnel. Following is a description of each sample location, a description of how each sample was collected and the analytical test results from the samples:

Sample No. ABC-8

Sample no. ABC-8 was collected from the fifty-five gallon drum previously described as the drum which was observed at substation no. 128 and subsequently moved to the area outside of building no. 39 on April 2, 1996. Mr. Hankin stated that he had the drum moved from outside building no. 39 to a more secure area inside of building no. 45. Upon arriving at building no. 45, the inspection team observed the drum inside of the building in a locked cage area. A lid had been placed on the drum, and yellow caution tape had been placed around the area containing the drum. During the December inspection, a sample of absorbent material from the bottom of the drum had been collected and the analytical results from that sample indicated PCBs at a concentration of 190,000 PPM (12/8/95, sample no. ABC-5). At the time of the subject inspection, Mr. Crutchley was unable to collect a sample of absorbent material as the drum now contained approximately three to four inches of water. As an alternative, Mr. Crutchley collected a sample of the water, which had an oily sheen. The sample was collected by dipping a clean one quart glass sample container in the water and alternately filling two one quart glass sample containers (See Photo No. 21). One of the quart containers remained in the custody of Mr. Crutchley and the other was given to facility personnel as a sample split.

Sample No. ABC-1

The inspection team next moved to building no. 219, substation no. 24. At this location a metal rack containing capacitors was observed inside of an electrical room adjacent to the substation. During the December inspection, a large stain was observed on the floor under the metal rack. At that time the stain was covered by absorbent material placed there by facility personnel. A sample was collected from the stained area by Mr. Crutchley and shipped to the Delaware State laboratory for analysis. While performing the analysis of this sample, the laboratory experienced a contamination problem in the lab and they were unable to perform a proper analysis of this sample. During the subject inspection, the large stain and absorbent material was still on the floor under the metal rack. Mr. Crutchley resampled this material which consisted of a tar like residue and placed equal portions of the material into two 40 ml glass sample vials (See Photo No. 22). Mr. Crutchley utilized a stainless steel spatula to scrape the material from the floor and place it into the glass vials. One vial remained in the custody of Mr. Crutchley and the other was given to facility personnel as a sample split.

Sample No. ABC-2

Sample no. ABC-2 consisted of a wipe from a stained area under a capacitor cabinet on the floor of an electrical room adjacent to substation no. 27 in building no. 250. A wipe of the stained area was collected by Mr. Crutchley during the December inspection; however, because of the lab contamination problem described above,

the lab was unable to perform an analysis. During the subject inspection, Mr. Crutchley utilized two 100 square centimeter templates to outline adjacent portions of the stained area. Each of the outlined areas was wiped with hexane soaked lab wipes and the lab wipes were placed into individual eight ounce glass sample containers (See Photo No. 23). One of the containers remained in the custody of Mr. Crutchley and the other was given to facility personnel as a sample split.

Sample No. ABC-6, ABC-7, ABC-9, & ABC-10

The inspection team next moved to building no. 301A where four samples were collected from the stained areas of the floor observed during the facility tour on 4/2/96.

Sample no. ABC-6 was a wipe sample collected from the floor of the larger room in building no. 301A (See Photo No. 24). Sample no. ABC-7 was a wipe sample collected from the floor of the smaller room in building no. 301A (See Photo No. 25). Mr. Crutchley utilized 100 square centimeter templates to outline stained areas of the floor in both rooms. For each sample, two templates were placed on the floor and lab wipes soaked with hexane were used to wipe the outlined areas. The lab wipes were placed into separate eight ounce glass sample containers. One container remained in the custody of Mr. Crutchley and other was given to facility personnel as a sample split.

Sample No. ABC-9 was a sample of tar like residue collected from a stained area of the floor in the larger room of building no. 301A (See Photo No. 26). Sample no. ABC-10 was a sample of the tar like residue collected from the floor of the smaller room in building no. 301A (See Photo No. 27). Mr. Crutchley utilized a clean stainless steel spatula to scrape the residue from the floor at each sample location. Equal portions of residue were placed into two 40 ml glass vials at each sample location. One vial from each location remained in the custody of Mr. Crutchley and the other containers were given to facility personnel as a sample split.

Sample No. ABC-11

Sample no. ABC-11 consisted of soil collected from a stained area of the ground adjacent to the entry gate to substation no. 128 (See Photo No. 28). Mr. Crutchley utilized a clean plastic scoop to scrape soil from throughout the stained area and placed the soil into a plastic lined tray. The soil was then mixed thoroughly and equal portions were placed into two eight ounce glass containers. One container remained in the custody of Mr. Crutchley and the other was given to facility personnel as a sample split.

All of the samples retained by Mr. Crutchley were returned to Annapolis and then shipped to the State of Delaware's Department of Natural Resources and Environmental Control laboratory for PCB analysis. The following table contains the analytical results from

glass coliwassa sampler which was lowered into the drum and then extracted so as to observe the material. The material appeared to be oil with a small amount of water.

The inspection team then entered building no. 247 and observed three drums in a small room towards the front of the building (See Photo No. 29). Two of the drums were plastic, 55 gallon capacity and had no markings or labels. The third drum was metal, 55 gallon capacity and was marked as containing premium motor oil 15W-40. On the floor in the same room as the three drums, the EPA inspector observed a large number of fluorescent light ballasts (See Photo No. 30). The ballasts were marked as being manufactured by General Electric & Universal. There was no indication on the labels that the ballasts contained PCBs (See Photo No. 31).

In a second room towards the back of building no. 247, the EPA inspector observed approximately twenty seven drums and six gas cylinders (See Photo Nos. 32 & 34). The drums were mainly fifty-five gallon metal drums with the exception of two which were 15 to 20 gallon metal drums (See Photo No. 33). The majority of the drums were not marked with any labels or other markings to indicate what they contained; however, one fifty-five gallon drum was marked with the word "waste" (See Photo No. 35). Of the two smaller drums, one was marked as containing "ZEP" and the other was marked as containing "flammable liquid, paint related material". The drums had been placed into the room haphazardly, some were dented and others were corroded. The EPA inspector did not observe any active leaks from the drums; however, the floor in the room was stained which may indicate that some material had leaked from the drums. The six gas cylinders (See Photo No. 34) were badly corroded and none had any markings to indicate what they contained.

The EPA inspector (Gerard Crutchley) questioned Mr. Hankin about the drums. Mr. Hankin stated that he thought the drums belonged to the Old York Road Bank. He said that they had renovated a building (not on-site) and that they had removed these drums during renovation and asked if they could store them temporarily at the Frankford Arsenal. Mr. Hankin said that Frank Dellmyer looked at the drums, but he did not know anything about the drums. Mr. Hankin then indicated that he was not sure who owned the drums or where they came from.

After returning to the facility's office, Mr. Hankin provided the EPA inspector with copies of two letters and some related documents supposedly regarding the drums observed at building no. 247 (See Attachment No. 7). The letters, dated 11/27/95 and 2/12/96, were addressed to the Midlantic Bank legal department from Arsenal Associates. Both letters referred to a situation where the Bensalem Pipe and Tube property located in Bensalem, Pa. was being cleaned to facilitate the sale of the property by the Bank and Trust Company of Old York Road. The cleanup was being performed by a sub-contractor, Canalley Management, who was also under contract to Arsenal Associates. It appears from the letters that Canalley Management requested approval to temporarily store waste oil

the sample analysis:

Sample No. & Description	Units	Analytical Results
Wipe Blank	ug	none detected
ABC-8, water from 55 gallon drum at building no. 45	mg/l	4.45
ABC-1, residue from floor of substation no. 24	mg/kg	720,000
ABC-2, wipe from stained area of floor at substation no. 27	ug	81
ABC-6, wipe sample of stained area of floor, larger room in building no. 301A	ug	425,000
ABC-7, wipe sample from stained area of floor, smaller room in building no. 301A	ug	135,000
ABC-9, residue from stained area of floor, larger room in building no. 301A	mg/kg	152,000
ABC-10, residue from stained area of floor, smaller room in building 301A	mg/kg	856,000
ABC-11, soil from stained area of ground adjacent to entry gate at substation no. 128	mg/kg	170

A copy of the analytical results from these samples is provided as an attachment to this report (See Attachment No. 13).

After completing the sample collection activities at the facility, the EPA inspector (Gerard Crutchley) recalled having heard either Joe Morrow or Lt. Robert Kelly say that during an earlier visit to the facility (11/95), they had observed a number of drums/containers in an area near building no. 147-A (concrete bunker where the 29 drums of PCB fluid had previously been stored).

Mr. Crutchley asked Lt. Kelly about the location and Lt. Kelly pointed out an area approximately 50 to 60 yards away from building 147-A. This area contained two concrete bunker type buildings which were identified as building nos. 247 & 248 (See Diagram No 4).

The inspectors entered building no. 248 and observed approximately 10 to 12 fifty-five gallon drums. These drums appeared to be empty with the exception of one drum which was full and marked with the name "Drydene". The EPA inspector utilized a

material at the Arsenal Business Center which was removed from the cleanup of the Bensalem property. In both letters, Arsenal Associates was requesting that Midlantic Bank take the necessary steps to remove the material from the Arsenal property or Arsenal Associates would have the material removed and disposed of and they would then bill the Midlantic Bank for the cost of disposal.

Closing Conference

At the conclusion of the inspection activities, the EPA representatives met with Mr. Hankin and Mr. Fellheimer to provide them with a preliminary summarization of the inspection findings. At this time Mr. Hankin presented a number of documents to Mr. Crutchley, most of which dealt with PCBs at the facility. The documents presented to Mr. Crutchley are as follows:

Attachment No. 1	A letter dated March 25, 1996 addressed to Mr. Crutchley from Arsenal Associates describing what actions the facility has taken since the PCB inspection in December.
Attachment No. 2	Copy of bills from the New Huntingdon Development Corporation for the painting of transformers at the facility.
Attachment No. 3	Letter dated 1/17/96 to G. E. Apparatus Services discussing the repairs of leaks on transformers at bldg. nos. 64, 150, 128, 219, 149, & 250.
Attachment No. 4	All available documentation regarding PCB transformers and oils shipped from the facility in November, 1995 and documentation regarding a shipment of PCBs and PCB Items shipped from the facility in 1991.
Attachment No. 5	Copy of a proposal from EET, Inc. to Arsenal Associates for the decontamination of PCBs in substations at the facility.
Attachment No. 6	Copies of daily inspection reports from 12/9/95 to 3/15/96.
Attachment No. 7	Copies of two letters regarding waste material stored at Arsenal Business Center that was removed from the Bensalem Pipe & Tube property.
Attachment No. 8	Copy of quarterly inspection report dated 4/1/96.
Attachment No. 9	Copy of the facility's lease agreement.
Attachment No. 10	Copy of documents received from AETS regarding

November 1995 PCB shipments.

Attachment No. 11 Copy of report from RUST Environment & Infrastructure, Inc. regarding mitigation of PCB contaminated areas at the business center.

Also included with the aforementioned documents were a copy of a letter from RUST Environment regarding their services during the December inspection (See Attachment No. 14) and a violation notice from the Philadelphia Fire Department, 11/29/95 (See Attachment No. 15).

During the closing conference, Mr. Hankin discussed the facility's efforts to cleanup the PCBs and repair the leaks on their transformers. Mr. Hankin said that following the December inspection, G.E. Apparatus Services came into the facility and cleaned up and repaired all of the PCB Transformers that were observed to be leaking during the December inspection. Following the work by General Electric, Mr. Hankin said that they contracted with the New Huntingdon Development Corporation for applying a fresh coat of paint to all of their transformers. Mr. Hankin said that this work is currently being done. Mr. Hankin also said that they have contracted with EETS, Inc. for the cleanup of all PCB contamination in the areas around the PCB Transformers.

Following this discussion, Mr. Crutchley then presented the preliminary findings to the facility personnel. A listing of these findings is included in the summary of findings attached to this report.

Post Inspection Activities

Subsequent to the actual inspection, Mr. Crutchley was contacted at least three different times by Mr. Hankin to discuss PCB contamination identified during the April inspection. Mr. Hankin said that the analytical results from the sample splits retained by the facility indicated PCBs at concentrations exceeding the regulatory limit of 50 PPM.

The first phone call (date not recalled) was a three way conversation between Mr. Mark Hankin, Gerard Crutchley and Mr. John Bartholomew of G.E. Mr. Hankin and Mr. Bartholomew reviewed with Mr. Crutchley the results of samples collected by the facility in the stained soil area adjacent to the entry gate at substation no. 128. After discussing the results, there was some discussion as to how to classify the area (e.g. restricted access, non-restricted access) for purposes of cleaning the area to meet the regulatory limits for cleanup of PCB spills. Mr. Crutchley told both Mr. Hankin and Mr. Bartholomew that he would review, in the PCB regulations, the various descriptions for restricted and non restricted access areas and get back to them regarding the proper classification of the contaminated area. Mr. Crutchley also told Mr. Hankin that they would have to collect samples from the surface of the concrete adjacent to the stained area to determine if there

was any residual contamination on the concrete surface. Mr. Crutchley reviewed the PCB Spill Policy and based on this review and having actually observed the site, Mr. Crutchley determined that the area should be classified as a restricted access area, other than electrical substation. Mr. Crutchley then contacted Mr. Hankin and Mr. Bartholomew to provide them with this information.

Mr. Crutchley received in the mail, a letter dated May 6, 1996 from Mr. Mark Hankin. This letter included analytical information regarding the contaminated soil area at substation no. 128 and also the analytical results from a sample of oil collected from the transformer which was first observed inside of building no. 128 during the December inspection (See Attachment No. 16). Mr. Crutchley received the same information a second time in a letter from Mr. Hankin dated 6/13/96 (See Attachment No. 17)

Mr. Hankin contacted Mr. Crutchley on at least two other occasions, once on 4/19/96 and a second time on 5/24/96 to discuss the contamination in building no. 301A. Building no. 301A is the building where facility personnel indicated that the sixty or so drums of PCB fluids were stored prior to shipment off-site. In these conversations, Mr. Hankin stated that the tile floor in this building was contaminated with PCBs (high concentrations) and he had questions as to the proper disposal of the tiles because they were vinyl asbestos tiles contaminated with PCBs and also what training/certification for personnel performing the removal of this material. For answers to his questions, Mr. Crutchley referred Mr. Hankin to the Toxics/CAA Toxics Enforcement Section in the regional office.

Mr. Crutchley was contacted on another occasion by Mr. Hankin's office to inform him that a package of material was being sent to the EPA office in Annapolis. This package, dated June 14, 1996 contained information regarding the PCB cleanup/decontamination performed by a facility contractor (EET) at building nos. 128, 149, 150, 219, & 250 (See Attachment No. 18).

Summary of Findings

The EPA Region III's Facility Inspection Program received a request from Region III's Hazardous Waste Management Program to conduct a RCRA Compliance Evaluation Inspection including Underground Storage Tanksat the Arsenal Business Center (Frankford Arsenal). As part of the inspection, the Facility Inspection Program was also asked to conduct a followup to the PCB Inspection which was conducted at the subject facility in December of 1995 and conduct an inspection under the Clean Water Act to determine if there are any water related issues at the facility. The following information is provided as a summary of the findings for each of the aforementioned inspection activities:

Resource Conservation and Recovery Act

The EPA representatives questioned facility personnel regarding activities at the facility (excluding tenant organizations) which may generate any waste materials (hazardous & non-hazardous). The owner of the facility, Mr. Mark Hankin described the activities at the facility as mainly general maintenance and building renovation. According to Mr. Hankin, in the process of renovating buildings, facility personnel generate scrap lumber and drywall. Painting in renovated buildings is done by contractors who remove their own waste (e.g. paint cans & rags). The renovation of some buildings involved asbestos removal; however, Mr. Hankin said that this work was conducted by contractors who handled any waste removal.

Mr. Hankin stated that tenant facilities are responsible for their own waste management as per their lease agreement.

During the subject inspection, the EPA representatives observed a number of 55 gallon drums, some smaller drums and some gas cylinders located in building nos. 247 & 248. Most of these drums were not marked, bungs were missing from some drums and some were dented and others were corroded. According to Mr. Hankin, these drums were placed there by a contractor who asked for approval to temporarily store the drums at the facility. However, in two separate letters to the responsible party, Mr. Hankin informed them that the drums had to be removed from the facility and properly disposed of or Arsenal Associates would handle the removal and disposal and bill the responsible party for the work.

Underground Storage Tanks

Mr. Hankin stated that he is not aware of the existence of any underground storage tanks at the subject facility. He did say that there is a project underway by the Army Corp of Engineers as part of a defense cleanup plan to remove six above ground tanks from the facility and the only other tank he was aware of is a portable tank for diesel fuel to supply facility maintenance equipment. He also said the company that supplies the diesel fuel owns the tank.

Clean Water Act

The EPA representatives questioned facility personnel regarding discharges of wastewaters to either the Delaware River, Frankford Creek, or the city sewer system. Mr. Hankin stated that the business center does not have any frontage on the Delaware River and he is not aware of any discharges from the facility to the river. One side of the facility is bordered by Frankford Inlet (formerly part of Frankford Creek). Mr. Hankin said that the only discharge to the inlet is from the stormwater system which was put in by the U.S. Army when the facility was owned by the government. According to the representatives from the city water department, the only discharge to the city sewer system from the facility is a permitted discharge from a tenant facility (Col Tec Corp.). The tenant is housed in building no. 238 and under the city's pretreatment program is allowed to discharge quench water and scrub water from their process to the sewer system; however at the time of the subject inspection, Col Tec was only discharging boiler water to the sewer system.

The only other water related issue discussed during the inspection was the situation regarding the discharge of water from building no. 124 to the Frankford Inlet. The building is currently occupied by Arsenal Marble & Granite, Inc. This facility has been utilizing a concrete pad for cutting, grinding, and washing stone (marble & granite). The pad has three drains which direct the flow from the pad to a piping system that discharges to the Frankford Inlet. As described in the report, there was some confusion between the city and the facility personnel (Arsenal Associates) regarding the actual discharge from the pad. The city claimed it discharged to the Frankford Inlet and facility personnel claimed it discharged to the city sewer system. To resolve the issue, the city and facility personnel conducted a dye test at the time of the inspection which indicated that the flow actually discharged to the Frankford Inlet. As a result of this test, the city sent a letter to the tenant facility (Arsenal Marble & Granite) to inform them that they would have to cease operations on this pad until the piping system was reconfigured to direct the flow to the city sewer system and they would also need to install a pretreatment system in the form of sand/sediment interception for all of the grinding, cutting, and washing areas at the facility.

Toxic Substances Control Act

As a follow-up to the TSCA/PCB inspection conducted at the Frankford Arsenal in December, 1995, the EPA inspector requested additional information from the facility regarding PCBs and PCB Items. During the inspection, the EPA inspector also visited a number of locations which contained PCB Transformers that were observed during the December inspection and collected a number of samples from various locations throughout the facility for PCB analysis. The following information includes the preliminary findings from this inspection:

1. A large pile of combustible material (wooden pallets & cardboard) was observed (4-2-96) adjacent to the PCB Transformer enclosure at building no. 219, substation no. 24. This is the same pile that was observed during the December, 1995 EPA inspection. The following day (4-3-96) the material had been removed from the area.

2. There was no PCB ML label marking the PCB Transformer enclosure at the substation near building no. 212.

3. An out of service transformer was observed outside of and adjacent to building no. 235. Although the transformer was marked with a label which indicated less than 50 PPM of PCBs, the facility personnel did not have any analytical data to confirm the PCB concentration in the transformer.

4. A 55 gallon drum containing debris (plastic bucket, tyvek suit, rubber hose and absorbent) was sampled at the time of the December, 1995 EPA inspection and the analytical results indicated that it contained PCBs at a concentration of 190,000 PPM. This same drum was observed during the subject inspection at the same location. The drum was not marked with a PCB ML label, it was not dated, and at the time of the subject inspection, the drum was open and it contained in addition to the aforementioned items, several inches of water (rainwater ?).

5. At the time of the subject inspection, the Philadelphia Fire Department had still not received any information from the facility regarding the PCB Transformers on-site (Fire Registration). During the closing conference, Mr. Hankin drafted a letter to the fire department and stated that he would immediately send the letter and the required registration information to the fire department.

6. During the subject inspection, the EPA inspector observed seven large PCB Capacitors in building no. 301A. The capacitors were not in service, they were not marked with PCB ML labels and the facility personnel said that they did not know anything about the capacitors.

7. The EPA inspector observed a large pile of light ballasts in building no. 247. Although the labels on the light ballasts did not indicate that they contained PCBs, the EPA inspector recommended that facility personnel make a determination regarding the PCB concentration in the ballasts and dispose of them accordingly.

From the time of the December, 1995 EPA inspection, the facility had hired General Electric to repair the leaks on all PCB Transformers and clean up any stains or residue on the exterior of these transformers. The facility had also contracted with New Huntingdon Development Corporation to apply a fresh coat of paint to all of these transformers. At the time of the subject

inspection, it appeared that the leaks on all of the transformers had been repaired and all stains and residue had been cleaned from the exterior of these transformers. It was also noted that a number of these transformers had been freshly painted although this work was not yet complete.

It was noted that oil/residue/stains observed on the concrete around the leaking transformers in December, 1995 had not yet been cleaned up. Mr. Hankin said that they have contracted with a company (EET) to cleanup all of this contamination, but the work had not yet begun at the time of the April, 1996 inspection.

During the subject inspection, the EPA inspector collected samples from eight different locations at the facility. These samples were returned to Annapolis and then shipped to Delaware's Department of Natural Resources and Environmental Control laboratory for PCB analysis. Four samples were collected from building no. 301A and the results indicated high levels of PCBs. This is the location where sixty drums of PCB fluids had previously been stored. A fifth sample was collected from a stained soil area outside of substation no. 128. This analytical results from this sample indicated PCBs at concentrations exceeding the regulatory limits. The other three samples were collected from locations previously sampled during the December, 1995 inspection. Two of these locations were resampled because of a laboratory error involving the samples from these two locations at the time of the December inspection and the other sample was collected from the drum of debris observed at substation no. 128.

Since the December inspection, the facility has initiated daily inspections of leaking PCB Transformers, quarterly inspections of all PCB Transformers and the facility has hired a consultant (RUST) to assist the facility in the preparation of annual records and annual document logs.